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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF RENEE RECORDS IN
SUPPORT OF REORGANIZED DEBTORS'
SEVENTY-SIXTH OMNIBUS OBJECTION
TO CLAIMS (NO LIABILITY /
PASSTHROUGH CLAIMS)**

**Response Deadline:
May 12, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: May 26, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Renee Records, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am the Claims Manager at Pacific Gas and Electric Company (the “**Utility**” or “**PG&E**,”
5 and, with PG&E Corporation, the “**Debtors**,” or, as reorganized pursuant to the Plan, the “**Reorganized**
6 **Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit this Declaration
7 in support of the Reorganized Debtors’ Seventy-Sixth Omnibus Objections to Claims (No Liability /
8 Passthrough Claims) (the “**Omnibus Objection**”),¹ filed contemporaneously herewith.

9 2. As part of my job duties, I manage, administer, and monitor third-party claims,
10 investigations, and incidents for final determination of property damage, bodily injury, and business
11 interruption. I oversee department caseload to ensure integrity and regulatory compliance. I develop and
12 present key analysis and reporting to enterprise officers, operations managers and clients regarding third-
13 party incidents.

14 3. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
15 my personal knowledge, the knowledge of other PG&E personnel working under and alongside me on
16 this matter, my discussions with the Reorganized Debtors’ various other advisors and counsel, and my
17 review of relevant documents and information. If called upon to testify, I would testify competently to
18 the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the
19 Reorganized Debtors.

20 4. The No Liability / Passthrough Claims are identified on Exhibit 1 to the Omnibus
21 Objection, in the columns headed “Claim/Schedule To Be Disallowed and Expunged.” Exhibit 1 also
22 specifically identifies in the “Basis for Objection” that the No Liability / Passthrough Claims are
23 classified as one of the following:

24 a. Damage Not Caused by PG&E. These are Proofs of Claim where the Reorganized
25 Debtors, after reviewing their books and records and any information submitted in connection with the
26 Proofs of Claim, have determined that the harm or damage described in the Proof of Claim was not

27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Omnibus Objection.

1 caused by the Debtors. Accordingly, the Reorganized Debtors have determined they are not liable for
2 these amounts and the corresponding Proofs of Claim should be expunged.

3 b. Post-Petition Claims. These Proofs of Claim assert Claims for amounts that arose after
4 the Petition Date and, thus, do not represent prepetition liabilities of the Debtors subject to payment
5 through the chapter 11 claims process. Pursuant to Section 2.1 of the Plan, any Allowed Administrative
6 Expense Claim that is not due and payable prior to the Effective Date, shall be paid by the Debtors or
7 the Reorganized Debtors, as applicable, in the ordinary course of business, consistent with past practice
8 and in accordance with the terms and subject to the conditions of any orders or agreements governing,
9 instruments evidencing, or other documents establishing, such liabilities. Accordingly, there is nothing
10 for this Court to resolve with respect to any such Claims and any Proofs of Claim filed on account of
11 such Claims should be expunged and the surviving claims may be asserted and resolved in the ordinary
12 course of business.

13 c. No Liability Claims. These Proofs of Claims provide no supporting documentation to
14 enable the Reorganized Debtors to understand the purported basis for liability and, after reviewing their
15 books and records, the Reorganized Debtors are unable to determine any liability or basis for the asserted
16 Claims. In all cases, the Reorganized Debtors' Third-Party Claims Team contacted the Claimant either
17 by telephone or in writing for more information, and did not receive a response.

18 d. Rule 16 Claims. Certain of the Proofs of Claim assert amounts for removal/trimming of
19 trees, overgrown vegetation impeding access to the Debtors' facilities, and/or the consequences of
20 opening locked gates. Pursuant to Pacific Gas and Electric Company Tariff Electric Rule 16 ("Rule
21 16"), PG&E shall "at all times have the right to enter and leave Applicant's Premises for any purpose
22 connected with the furnishing of electric service (meter reading, inspection, testing, routine repairs,
23 replacement, maintenance, vegetation management, emergency work, etc.) and the exercise of any and
24 all rights secured to it by law, or under PG&E's tariff schedules." Accordingly, the Rule 16 Claims
25 assert amounts for which the Debtors are not liable and the corresponding Proofs of Claim should be
26 disallowed and expunged.

27 5. If not disallowed and expunged, the No Liability / Passthrough Claims potentially could
28 allow the applicable Claimants to receive recoveries to which they are not entitled.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief. Executed this fifteenth day of April, 2021.
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/s/ Renee Records
Renee Records